

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>CHANTEL DEELVA PELAEZ</b>	:	
<b>DEBTOR</b>	:	
	:	<b>BANKRUPTCY NO.: 19-12241-PMM</b>

**RESPONSE TO MOVANT'S MOTION FOR RELIEF**

Debtor ("Respondent"), by their attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Denied. Movant's averment refers to document filed and on record. Said documents speak for themselves and any averment describing or characterizing said documents, or the record itself, is denied.
3. Denied. Debtor has cured any alleged arrears. Furthermore, after a reasonable investigation, the Debtor does not have the requisite knowledge to attest to the veracity of Movant's averment concerning attorney fees. Thus, Movant's averment is denied.
4. Denied. Movant's averment does not call for a response. By way of further response, relief from the automatic stay is not appropriate as there are no post-petition payments due.
5. Denied. Movant's averment is a conclusion of law to which no response is required. By way of further response, relief from the automatic stay is not appropriate as there are no post-petition payments due nor any other cause to grant relief.
6. Denied. Movant's request does not call for a response. Additionally, for the reasons stated above, neither relief from the stay, nor a waiver of Rule 3002.1, is appropriate.

WHEREFORE, Debtor prays that the Movant's Motion be denied.

Respectfully Submitted,

Date: December 26, 2024

/s/ Brandon J. Perloff  
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